

REMARKS

Applicants thank Examiner Tommy D. Lee for having allowed all of the present claims except claim 5. As to claim 5, the Applicants once again most respectfully traverse, for the reasons set forth below.

Section 102 rejection

In the Official Action it is said that claim 5 is anticipated by Kanematsu. In the Action at bottom of page 4 it is said:

"The claim merely requires that one least-significant bit (the dummy bit) results from the step of rendering the image."

Applicants agree to this characterization.

Applicants also agree to the proposition at bottom of page 2, in the Action, to the effect that Kanematsu's randomized value (his "calculated remainder of selected random number value") would be the Applicants' least significant bit "used as an index number for selecting a" superpixel — if only that "calculated remainder" did result from the rendering step.

The Action also suggests, however, that Kanematsu satisfies the first above-quoted claim limitation. Applicants had attempted to show that Kanematsu failed to satisfy this limitation, but as seen from the Action at top of page 5 the Applicants' reasoning was not followed by the Examiner.

The undersigned most sincerely apologizes to the Examiner. The reasoning should have mentioned each logical step leading to the conclusion that Kanematsu's selection process fails to result from rendering. The stated reasoning should have included the fact that Kanematsu states at his column 5, lines 60 through 62:

"One 4-bit random number value (rnd(0)) is read out from the . . . random number storage unit 1003."

Applicants' stated reasoning also should have pointed out that:

- those random numbers stored in Kanematsu's unit 1003 are not derived from his image rendering;
- they are expressly said (column 5, lines 24 through 37) to be generated by "the method shown in Figs. 3 and 4";
- that method is clearly unrelated to Kanematsu's image rendering: rather, he begins with a wholly regular, systematic pattern shown in his Fig. 3, and then proceeds by swapping particular data entries in that tabulation (see column 5, lines 33 through 36);
- the particular values to be swapped are selected randomly (see column 5, lines 33 and 34) — i. e., not by any procedure found from his rendering; and
- thus Kanematsu bootstraps his way from his "random number values" (used to select data entries to swap) to his final "random number sequence" of Fig. 4.

Now this information can be combined with the Applicants' previous assertion that Kanematsu completes the process simply by

dividing a random number from that "random number sequence (Fig. 4)" by a constant, namely eight.

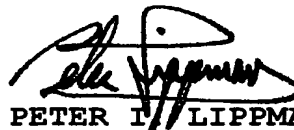
The constant, too, is independent of his rendering step. The constant (eight) is just a system-design parameter, namely "the number of patterns of quantized data of an identical signal level" — in other words, the number of different super-pixels — available for selection.

Hence Kanematsu's LSB selection is absolutely independent of his rendering, and he cannot anticipate claim 5. Q. E. D.

Conclusion

In view of the foregoing remarks, Applicants respectfully request the Examiner's favorable reconsideration and allowance of all the claims now standing in this case. It is respectfully requested that, should there appear any further obstacle to allowance of the claims herein, the Examiner telephone the undersigned attorney to try to resolve the obstacle.

Respectfully submitted,



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